



IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Reinout G. Oussoren)

Jack T. Clements)

Serial No. 09/430,063)

Filed: 10/29/99)

UNITARY FILTER CARTRIDGE)

Examiner: Minh-Chau Pham

Art Unit: 1724

Attorney Docket No. BHAG.68900

RECEIVED
MAY 02 2002
TC 1700

13/KW
5/8/02

COMBINED DECLARATION UNDER 37 CFR 1.131 and 37 CFR 1.132

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I, Jack T. Clements, declare that:

1. I am a citizen of the United States of America, I am one of the joint inventors of the subject patent application, and I reside at 113 NE Cove Drive, Lee's Summit, Missouri 64064.

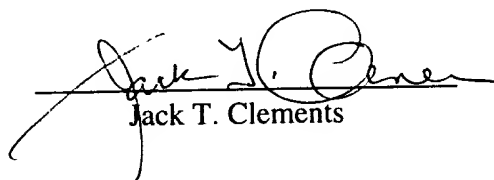
2. The subject matter set forth in each of the Claims 1-11 of the application was invented at least before the filing date of September 4, 1998 of the Brunner U.S. Patent No. 5,964,909 which issued October 12, 1999.

3. I have a BS degree in science and have been employed as a design and chief engineer of air pollution control filters and equipment for approximately 30 years. I have reviewed the Brunner U.S. Patent No. 5,964,909 and disagree with the Examiner's comments in the Office Action dated January 22, 2002 as to the subject matter taught by our U.S. Patent No. 5,632,791. I believe that the subject matter set forth in each of the Claims 1-11 is taught to one skilled in the art of filters and air pollution control equipment in our original disclosure of U.S. Patent No. 5,632,791. Understanding that the Examiner may disagree with my own understanding as to what is taught to one skilled in the art in our original disclosure of U.S. Patent No. 5,632,791, the subject matter set

forth in each of the Claims 1-11 of the application was invented at least before the filing date of September 4, 1998 of the Brunner U.S. Patent No. 5,964,909 which issued October 12, 1999. Attached as Exhibit A is a sketch I personally prepared and dated on May 22, 1995 which was faxed to a prospective customer of SF Air Filtration, Inc. which was a wholly owned subsidiary of my employer BHA Group, Inc. ("BHA"), assignee of U.S. Patent No. 5,632,791. The sketch illustrates a tubular metal insert, commonly known in the air pollution control industry as a venturi, installed in the mouth of the filter cartridge to effect a friction fit seal between the tube sheet opening and the resiliently deformable, molded top of the filter cartridge. Also attached as Exhibits B, C & D are production drawings of BHA for various sized venturi inserts for filter cartridges and which respectively bear the dates 3-6-96, 7-24-96 and 9-19-96. Each of these drawings was prepared under my supervision on or about the dates indicated in 1996. Exhibits B, C & D show dimensional details of venturis for installation in the mouth of a filter cartridge of a particular size to effect a friction fit seal between the tube sheet opening and the resiliently deformable, molded top of the filter cartridge. For example, Exhibit B illustrates the venturi to insert in a top access filter cartridge to be installed in a tube sheet having a circular opening of 6.25 inches. Exhibits A-D clearly demonstrate that the subject matter set forth in each of the Claims 1-11 of the application was invented at least before the filing date of September 4, 1998 of the Brunner U.S. Patent No. 5,964,909.

4. The subject matter set forth in each of the Claims 12-16 of the application are not taught or disclosed to one skilled in the art in Brunner U.S. Patent No. 5,964,909. Specifically, Brunner does not show or describe a contoured or scallop molded flange for the top fitting which is the general subject matter of Claims 12-13. Likewise, Brunner does not show or describe any of the features of Claims 14-16 generally used to center and position the pleat pack relative to the bottom end cap.

5. I hereby declare that all statements made herein of my own knowledge are true and that all statements made on information and belief are believed to be true; and further that these statements were made with the knowledge that willful false statements and the like so made are punishable by fine or imprisonment, or both, under Section 1001 of Title 18 of the United States Code and that such willful false statements may jeopardize the validity of the application or any patent issued thereon.



Jack T. Clements

4/11/02
Date